



Federal Regulatory Affairs

2300 N St. NW, Suite 710 Washington DC 20037

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March 20, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On March 16, 2012, Kathleen Abernathy, Chief Legal Officer and Executive Vice President, Government and Regulatory Affairs, Frontier Communications, and the undersigned met with Angie Kronenberg, Wireline Legal Advisor to Commissioner Clyburn.

The participants discussed the Petition for Clarification that Frontier filed with Windstream,¹ which requested the Commission to clarify that it did not intend to flash cut existing originating intrastate access rates for VoIP-terminating access traffic to the interstate rate level. Frontier explained that the effect of such an action could have significant revenue impacts on an ongoing basis as there is no originating access transition currently in place that would harmonize originating intrastate or interstate rates. The discussion was consistent with points made in the *Petition* and also the attached handout.

Frontier also provided Ms. Kronenberg with a copy of its February 23, 2012, confidential ex parte filing² in the above-referenced dockets in order to demonstrate potential financial impacts. Frontier accordingly is attaching a redacted copy of this filing.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Please feel free to contact me with any further questions.

¹ See Petition for Reconsideration and/or Clarification filed by Frontier Communications Corp. and Windstream Communications, Inc. ("*Petition*"), WC Docket 10-90, et al., at 21-29 (filed Dec. 29, 2011).

² Letter from Michael D. Saperstein, Jr., Frontier Communications, to Marlene H. Dortch, Federal Communications Commission, GN Dkt. No. 09-51 *et al.* (filed Feb. 23, 2012).

Sincerely,

A handwritten signature in blue ink, reading "Michael Saperstein Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.
Director of Federal Regulatory Affairs
Frontier Communications
(202) 223-6807

cc: Angie Kronenberg

Attachment